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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**FURTHER JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING THE  
APPOINTMENT OF A SPECIAL  
MASTER FOR EVIDENTIARY  
DISPUTES (DKT. 959)**

The Honorable Judge Yvonne Gonzalez Rogers

Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on June 23, 2023, the Parties jointly selected the Honorable Elizabeth D. LaPorte (Ret.) to be appointed as the Special Master (Dkt. 959);

WHEREAS, on August 25, 2023, the Court appointed the Honorable Elizabeth D. LaPorte (Ret.) as the Special Master to serve in the role as Special Master regarding evidentiary disputes:

- Judge LaPorte will rule on certain objections to deposition designations and counter-designations to the extent such rulings can be made prior to trial, are not subject to motions *in limine* to be decided by the Court, and do not require analysis of the context in which the designations are offered at trial;
- Judge LaPorte will rule on certain objections to the parties’ proposed trial exhibits to the extent such rulings can be made prior to trial, are not subject to motions *in limine* to be decided by the Court, and do not require analysis of the context in which the exhibit is offered at trial;
- Judge LaPorte will rule on any other evidentiary disputes that the Parties jointly agree to submit to Judge LaPorte, subject to the Court’s approval. (Dkt. 978)

WHEREAS, the Parties further agree to evenly split (*i.e.*, 50% to be paid by Plaintiffs, and 50% to be paid by Google) the fees for the Special Master;

WHEREAS, the Parties further agree that the Special Master may utilize a law clerk to assist the Special Master’s work;

WHEREAS, the Parties further agree to the Special Master’s fee schedules, attached hereto as Composite Exhibit A;

NOW, THEREFORE, the Parties stipulate as follows:

- The Parties will evenly split the fees for the Special Master;
- The Special Master may utilize a law clerk to assist the Special Master’s work;
- The Parties will abide by the fee schedules attached hereto as Composite Exhibit A.

DATED: September 1, 2023

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**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this FURTHER JOINT STIPULATION AND [PROPOSED] ORDER REGARDING THE APPOINTMENT OF A SPECIAL MASTER FOR EVIDENTIARY DISPUTES (DKT. 959). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: September 1, 2023

By /s/ Ryan J. McGee

Ryan J. McGee

*Counsel on behalf of Plaintiffs*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court previously **ORDERED**:

The Honorable Elizabeth D. LaPorte (Ret.) has been appointed as the Special Master to resolve evidentiary disputes regarding: certain objections to deposition designations and counter-designations to the extent such rulings can be made prior to trial, are not subject to motions *in limine* to be decided by the Court, and do not require analysis of the context in which the designations are offered at trial; certain objections to the parties' proposed trial exhibits to the extent such rulings can be made prior to trial, are not subject to motions *in limine* to be decided by the Court, and do not require analysis of the context in which the exhibit is offered at trial; and any other evidentiary disputes that the Parties jointly agree to submit to Judge LaPorte, subject to the Court's approval.

Additionally, the Court hereby **ORDERS**:

- The Parties will evenly split the fees for the Special Master;
- The Special Master may utilize a law clerk to assist the Special Master's work;
- The Parties will abide by the fee schedules attached hereto as Composite Exhibit A.

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge